

Christine H. Chung PLLC

PG | PERRY GUHA LLP

March 2, 2021

**VIA ECF**

Honorable Alvin K. Hellerstein  
 United States District Court  
 Southern District of New York  
 500 Pearl Street, Room 1050  
 New York, New York 10007

Re: United States v. Victor Mones Coro  
 S4 19 Cr. 144 (AKH)

Dear Judge Hellerstein:

We write on behalf of Victor Mones Coro to respectfully request that Mr. Mones' sentencing, currently scheduled to take place next Monday, March 8, 2021, at 10:30 a.m., be adjourned to a date during the following week, beginning March 15, 2021, if there is a date and time convenient to the Court, and to inquire of the Court of the possibility of conducting an in-person sentencing proceeding.

Mr. Mones filed his sentencing memorandum on February 20, 2021, after the filing of the PSR five days previous to that date, on February 16, 2021.<sup>1</sup> The reason for requesting an adjournment is that the defense just received the government's sentencing submission this morning.<sup>2</sup> A brief adjournment will ensure us sufficient time to prepare the defense reply, including with adequate opportunity to consult with Mr. Mones, who is incarcerated at the MCC. Mr. Mones has also sought subpoenaed material relevant to his sentencing and will learn later this week if there will be timely production.<sup>3</sup>

It is also apparent that the sentencing will be hard fought and for that reason, among others, we plan to confer further with Mr. Mones about the mode of the sentencing hearing. To aid in that decision-making, and with full desire that any attendee of the proceeding feel safe, we respectfully inquire of the Court whether the Court would be amenable to conducting an in-person sentencing proceeding. We do not envision a usual in-person sentencing but instead one with your Honor presiding (and other members of Chambers present), with Mr. Mones and two of his counsel present, government counsel present, and with Mr. Mones' family and others on a video connection (or audio if video is unavailable for that purpose).

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<sup>1</sup> The PSR has since been revised twice, on February 18, 2021, and February 23, 2021.

<sup>2</sup> We asked the government on February 20, 2021, to inform us of when it planned to file its brief but had not received a response.

<sup>3</sup> The government is aware of this subpoena.

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We would very much appreciate being able to discuss this matter with Mr. Mones knowing what the Court considers to be the possibilities. Mr. Mones had COVID-19 in March/April 2020 and recovered, and any attendees from the defense side would be willing to undergo testing before attending an in-person hearing. If your Honor does not wish to conduct any in-person proceeding now but has a future date in mind for resuming in-court proceedings, we also would appreciate being able to take that timing into account.<sup>4</sup>

We are available to discuss the mode of the sentencing on a telephone call should the Court wish to do so.

Respectfully submitted,



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<sup>4</sup> We are aware of the Court's COVID-19-related orders and announcements but from information such as the Court's weekly proceedings calendars, it seems that the timetable of returning to conducting in-person proceedings is also varying by judge.